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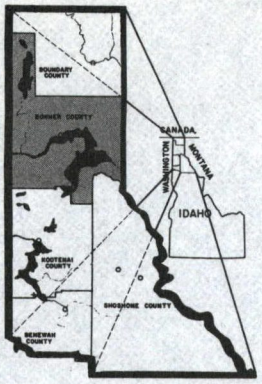

PANHANDLE HEALTH DISTRICT I

P. O. Box 734
1020 Michigan
(Ella Street at Michigan Street)
Sandpoint, Idaho 83864
(208) 263-5159

Environmental Health
Vital Statistics
Home Health
Health Education
Family Planning
Well Child Conference
WIC Clinics
Immunizations

August 2, 1982

Mike Brown
EPA
Waste Management Branch
1200 6th
M.S. 533
Seattle, WA 98101-3188

Dear Mike:

Enclosed is a copy of the inspection of the Arrcom facility at Rathdrum.

If you have any questions concerning this, please contact us.

Sincerely,

Ken

Kenneth L. Babin
Environmental Health Specialist

KLB/vg

Enclosures

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Arrom Inc. EPA I.D. Number: 1DD008080961

COMPANY ADDRESS: P.O. Box 93, Woodland, WA 98674

COMPANY CONTACT OR OFFICIAL: Warren Bingham

TITLE: Site Owner

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY: ___ NPDES ___ AIR ___ OTHER None

INSPECTOR'S NAME: Ken Babin

DATE OF INSPECTION: 7-20-82

BRANCH/ORGANIZATION: Panhandle Health District I

TIME OF DAY INSPECTION TOOK PLACE: 9:30 am

1) Is there reason to believe that the facility has hazardous waste on site? Yes

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

___ Company admits that its waste is hazardous during the inspection.

X Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

___ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

___ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

___ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

___ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

X Company is unsure but here is reason to believe that waste materials are hazardous. (Explain) Site was reportedly receiving RCRA listed waste solvents however present owner does not know whether or not this is so.

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	___	___	X

Please explain: Material in tanks on site is unknown.

c. Identify the hazardous wastes by hazardous waste code that are on-site, and estimate approximate quantities of each.

2) Does the facility generate hazardous waste?	___	___	___
3) Does the facility transport hazardous waste?	___	___	___
4) Does the facility treat, store or dispose of hazardous waste?	___	___	___

This facility is not now in operation and current owner is not familiar with past operations.

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	—	—	—
b. Is there a suitable barrier which completely surrounds the active portion of the facility?			
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	—	—	—
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	—	—	—
a. If "YES", what are the approximate quantities?			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	—	—	—
c. If "YES", explain			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	—
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	—	—	—
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	—	—	—
- damage the structural integrity of the device or facility containing the waste?	—	—	—
- threaten human health or the environment?	—	—	—

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?	___	___	___
- a telephone or other device to summon emergency assistance from local authorities?	___	___	___
- portable fire equipment?	___	___	___
- adequate aisle space?	___	___	___
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	___	___	___

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? ___ ___ ___

___ ___ ___

If you have, please comment, as appropriate.

(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. ___ ___ ___

b. Do you believe that operation of this facility may affect groundwater quality? ___ ___ ___

c. If "YES", explain.

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? ___ ___ ___

a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? ___ ___ ___

b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)

c. Does each manifest (or a representative sample) have the following information?

- a manifest document number ___ ___ ___

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number	___	___	___
- the name, and EPA identification number of each transporter	___	___	___
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;	___	___	___
- a DOT description of the wastes	___	___	___
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	___	___	___
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	___	___	___
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.	___	___	___
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)	___	___	___
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ____ All wastes are basically the same ____ Company treats all waste as hazardous ____ Don't Know ____			
b. Does hazardous waste come to this facility from off-site sources?	___	___	___
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	___	___	___
(12) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?	___	___	___
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?	___	___	___
c. Does the owner/operator record inspections in a log?	___	___	___
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.	___	___	___

	YES	NO	DON'T KNOW

(13) PERSONNEL TRAINING (§265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? ___ ___ ___
- type and amount of training to be given to personnel in jobs related to hazardous waste management? ___ ___ ___
- actual training or experience received by personnel? ___ ___ ___

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51) ___ ___ ___

a. Does the plan describe arrangements made with local authorities? ___ ___ ___

b. Has the contingency plan been submitted to local authorities? ___ ___ ___

How do you know?

c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? ___ ___ ___

d. Does the plan have a list of what emergency equipment is available? ___ ___ ___

e. Is there a provision for evacuating facility personnel? ___ ___ ___

f. Was an Emergency Coordinator present or on call at the time of the inspection? ___ ___ ___

(15) Does the owner/operator keep a written operating record with: (§265.73)

- a description of wastes received with methods and dates of treatment, storage or disposal? ___ ___ ___
- location and quantity of each waste? ___ ___ ___
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? ___ ___ ___
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? ___ ___ ___

*(16) Does the facility have written closure and post-closure plans? (§265.110) ___ ___ ___

a. Does the written closure plan include:

- a description of how and when the facility will be partially (if applicable) and ultimately closed? ___ ___ ___

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	___	___	___
- a description of the steps necessary to decontaminate facility equipment during closure?	___	___	___
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	___	___	___
b. What is the anticipated date for final closure?	___	___	___
c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?	___	___	___
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?	___	___	___
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?	___	___	___
17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?	___	___	___
18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)	___	___	___
19) Has a groundwater monitoring program been implemented?	___	___	___
a. If "yes," has the facility installed 1 upgradient and 3 downgradient monitoring wells?	___	___	___
b. Is there a groundwater sampling and analysis available at the facility?			
c. Does the water sampling and analysis plan include procedures and techniques for:			
- Sample collection	___	___	___
- Sample preservation and shipment	___	___	___
- Analytical procedures	___	___	___
- Chain of custody procedures	___	___	___

	YES	NO	DON'T KNOW
d. Has the facility opted to maintain an alternate groundwater monitoring system?	___	___	___
e. If answer is "yes" to "d" above, have they submitted the alternate groundwater monitoring plan to the Regional Administrator per 265.90(d)?	___	___	___
f. Has the alternate groundwater monitoring plan been certified by a qualified geologist or geotechnical engineer?	___	___	___
g. Is the facility waiving the groundwater monitoring requirements per §265.90(c)?	___	___	___
h. If answer is "yes" to "g" above, does the written demonstration appear to meet the requirements of §265.90(c)?	___	___	___

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p.9	Tank p.8	Landfill pp.10-11
Surface Impoundment p. 8	Surface impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p.7	Incineration pp. 12-13	Surface Impoundment p.8
Tank, above ground p.8	Thermal Treatment pp. 12-13	
Tank, below ground p.8	Land Treatment pp. 9-10	Other_____
a. can be entered for inspection ____		
b. cannot be entered for inspection ____		
Other_____	Chemical, Physical and Biological Treatment (other than in tanks, surface impoundment of land treatment facilities) p. 13	
	Other _____	

CONTAINERS (§265.170)	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES," explain.	____	____	____
2. Are there any containers which appear in danger of leaking? If "YES," explain.	____	____	____
3. Do wastes appear compatible with container materials?	____	____	____
4. Are all containers closed except those in use?	____	____	____
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?	____	____	____
6. How often does the plant manager claim to inspect container storage areas? _____			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES," explain.	____	____	____
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	____	____	____
9. What is the approximate number and size of containers with hazardous wastes?	____	____	____

TANKS (§265.190)	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain.	___	___	___
2. Are there any tanks which appear in danger of leaking. If "YES", explain.	___	___	___
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.	___	___	___
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?	___	___	___
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.	___	___	___
7. How often does the plant manager claim to inspect container storage areas?			
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.	___	___	___
9. What is the approximate number and size of tanks containing hazardous wastes?			

SURFACE IMPOUNDMENTS (§265.220)			
1. Is there at least 2 feet of freeboard in the impoundment?	___	___	___
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.	___	___	___
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.	___	___	___

	YES	NO	DON'T KNOW
4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.	—	—	—
5. Are there any leaks, failures or is there any deteriorization in the impoundments? If "YES", explain.	—	—	—
6. Give the approximate size of surface impoundments (gallons or cubic feet).			

WASTE PILES (§265.250)

1. Is the waste pile protected from wind erosion?	—	—	—
a. Does it appear to need such protection?	—	—	—
b. Explain what type of protection exists.			
2. Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.	—	—	—
3. Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.	—	—	—
a. Is the pile placed on an impermeable base that is compatible with the waste?	—	—	—
b. Is the pile protected from precipitation and run-on?	—	—	—
4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.	—	—	—
Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste? Please explain.	—	—	—
5. How many waste piles are on site, and approximately how large are they?			

LAND TREATMENT (§265.270)

1. Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the

	YES	NO	DON'T KNOW
*2. Is run-on diverted away from the active portions of the land treatment facility?	—	—	—
*3. Is run-off collected?	—	—	—
4. Are food chain crops being grown on the facility property?	—	—	—
a. If "YES", can the facility operator document that arsenic, lead and mercury:			
- will not be transferred to the crop or ingested by food chain animals or	—	—	—
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.	—	—	—
b. Has notification of the growing of the food chain crops been made to the Regional Administrator?	—	—	—
5. Is there a written and implemented plan for unsaturated zone monitoring?	—	—	—
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?	—	—	—
7. Do the closure and post-closure plans address:			
a. control of migration of hazardous wastes into the groundwater?	—	—	—
b. control of run-off, release of airborne particulate contaminants?	—	—	—
c. compliance with requirements for the growth of food-chain crops (if they are present)?	—	—	—
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.	—	—	—
9. Are incompatible wastes placed in the same land treatment area? If "YES", explain.	—	—	—
10. What is the area of the land receiving hazardous waste treatment?	—	—	—

LANDFILLS (§265.300)

†1. Is run-on diverted away from the active portions of the landfill?	—	—	—
†2. Is run-off from active portions of the landfill collected?	—	—	—

* Effective date for these requirements is May 19, 1981.

† These requirements are effective November 19, 1981.

	YES	NO	DON'T KNOW
3. Is waste which is subject to wind dispersal controlled? Explain.	___	___	___
4. Does the owner/operator maintain a map with:			
- the exact location and dimensions of each cell	___	___	___
- the contents of each cell and approximate location of each hazardous waste type	___	___	___
5. Do the closure and post-closure plans address:			
- control of pollutant migration via ground water?	___	___	___
- control of surface water infiltration?	___	___	___
- prevention of erosion?	___	___	___
6. Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.	___	___	___
7. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell? If "NO", explain.	___	___	___
8. Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",	___	___	___
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?	___	___	___
b. Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
*9. Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?	___	___	___
If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?	___	___	___

11. What is the approximate area of the hazardous waste landfill?

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* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT
(§§265.340 and 265.379)

	YES	NO	DON'T KNOW
1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?			
2. Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.	—	—	—
3. Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste	—	—	—
- halogen content	—	—	—
- sulfur content	—	—	—
- concentration of lead	—	—	—
- concentration of mercury	—	—	—

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here [ ].

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?	—	—	—
5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:			
- waste feed	—	—	—
- auxiliary fuel feed	—	—	—
- air flow	—	—	—
- incinerator temperature	—	—	—
- scrubber flow	—	—	—
- scrubber pH	—	—	—
- relevant level controls	—	—	—
Every hour for:			
- stack plume (color and opacity)	—	—	—
5. Is there open burning of hazardous waste?	—	—	—

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.	—	—	—
a. Is there any evidence of fugitive emissions?	—	—	—
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	—	—	—

8. What types of air pollution control devices (if any) are installed on the incinerator?

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400)

1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.	—	—	—
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?	—	—	—
3. Is there ignitable or reactive waste fed into the treatment system?	—	—	—
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.	—	—	—
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	—	—	—

5. Describe the treatment system at this facility.